

EXHIBIT “C”

Prebill print date: 04/02/19

For Client: 04260022

Prebill # 360941 Page 1

Robinson, Tamra

Billing Atty: Faelo, G. Kevin

Time Through: 03/31/19

Client: 04260022 Robinson, Tamra

Tamra Robinson
[REDACTED]

BILL GROUP ID: MAIN-Primary Bill Group

Billing Assistant: [REDACTED]

"BILLS WILL NOT BE PROCESSED WITHOUT YOUR SELECTION BELOW"**TO INITIATE YOUR BILLING REQUESTS, CHECK THE APPROPRIATE BOXES**

- ☐ Bill Fees and Costs
☐ Send A/R Statement Only
☐ Bill Fees Only
☐ Bill Costs Only

- ☐ HOLD, do not bill
☐ Write-off Fees as indicated below
☐ Write-off Costs as indicated below
☐ For Internal Billing ONLY (Admin & 56 series Matters)
 Process zero fee billing - DO NOT BILL

- ☐ Bill Flat Fee amount of \$ _____
 (FF can only be billed if all work has been completed and all
 time and costs are showing on this prebill)

- ☐ Transfer WIP Fees/Costs to: _____

- ☐ FORWARD TO THE FOLLOWING ATTORNEY FOR REVIEW _____
 (If different from reviewing attorney)

- ☐ CLOSE MATTER & Refund any remaining Trust or
 Prepaid (Can take up to 30 days)

- ☐ TURN OVER TO COLLECTION GROUP

Trust Funds

Available For Use: \$0.00

Total Trust: 0.00

Evergreen Replenishment Amount

Prepaid Available: \$0.00

Apply? ☐ Yes ☐ No

\$ _____

\$ _____

Apply? ☐ Yes ☐ No

Amount: \$ _____

04260022.00001

WRITE OFF EXCEPTION CODE: _____

BILLING COMMITTEE OKAY??

Matter: Robinson v. First State Community Action Agency
[REDACTED]

Prebill print date: 04/02/18

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Robinson, Tamra

<u>TIME ID#</u>	<u>Date</u>	<u>Act</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amt. to Bill</u>
<u>Fazio, G. Kevin</u> 2324677	09/28/17			Review memorandum and order from court; Emails with client and counsel regarding same	1.80	\$410.00	\$779.00
2334062	09/12/17			Emails with client on court decision	0.40	\$410.00	\$164.00
2342040	09/20/17			Review email from opposing counsel on settlement; and discuss same with KRW	0.50	\$410.00	\$205.00
2342077	09/21/17			Draft response for opposing counsel and email client on same; Discuss options with KRW	0.80	\$410.00	\$369.00
2346810	09/26/17			Email with opposing counsel on settlement issues	0.50	\$410.00	\$205.00
2346823	09/26/17			Review email from opposing counsel on settlement; Draft response and send; Discussion about appeal options	0.80	\$410.00	\$328.00
2351199	09/28/17			Review court notices	0.30	\$410.00	\$123.00
2352199	10/03/17			Emails with client; Email on appeal issues	0.50	\$410.00	\$205.00
2353239	10/04/17			Review appeal documents and research on appellee response	0.70	\$410.00	\$287.00
2354717	10/06/17			Research on bond issue; Draft email for counsel on same; Prepare entry of appearance and corporate disclosure forms	2.00	\$410.00	\$820.00
2357298	10/09/17			File entry of appearance and corporate disclosure forms; Email counsel on bond issue; Review court filings	1.20	\$410.00	\$492.00
2357313	10/10/17			Review court filings			
2358782	10/12/17			Review and respond to Counsel's email on alleged statutory issue; Review court filings; Review Appellant's statement of the case			
2359883	10/13/17			Review filing from opposing counsel	0.20	\$410.00	\$82.00
2362682	10/16/17			Review mediation filings; Research on defendant claims regarding interactive process	0.80	\$410.00	\$369.00
2362870	10/17/17			Address issue with Bond; Review mediation materials; Email with client; Research defendant's interactive process argument	2.50	\$410.00	\$1,025.00
2365854	10/18/17			Research on new issue raised by First State; Review requirements for mediation statement and filings; Call with IFS regarding Bond estimate	3.90	\$410.00	\$1,599.00
2365867	10/19/17			Meet with Katherine on motion for execution; Research on information for mediation statement; Review filing			
2371627	10/25/17			Address execution issues			
2371610	10/29/17			Draft mediation statement and email regarding same	2.10	\$410.00	\$861.00
2375411	10/30/17			Draft and revisions to mediation statement	2.80	\$410.00	\$1,088.00
2375459	10/31/17			Revisions to mediation statement; Finalize and file same; Email client	0.80	\$410.00	\$248.00
2384498	11/07/17			Emails on execution discovery	0.50	\$410.00	\$205.00
2384530	11/09/17			Review and revise subpoena	0.60	\$410.00	\$246.00
2384544	11/10/17			Review execution documents and subpoena	0.70	\$410.00	\$287.00
2392738	11/20/17			Emails with Court and client on mediation status	0.80	\$410.00	\$248.00

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Robinson, Tamra

Case No.	Date	Description	Hours	Rate	Amount
<u>Faslo, G. Kevin</u> 2392751	11/21/17	Review motion filed by First State and assign research on response; Meet with Katherine and Anthony to discuss motion and response	2.10	\$410.00	\$861.00
2393452	11/22/17	Prepare for and participate in mediation; Research on motion issues	4.00	\$410.00	\$1,640.00
2399387	11/30/17	Address issues related to response to motion; Address issues with subpoena			
2401929	12/01/17	Review/revise draft response to motion; Final revisions and file response; Review new motion in District Court to stay execution	6.00	\$410.00	\$2,460.00
2404589	12/04/17	Review emails from opposing counsel and court notice on pending District Court motion			
2404581	12/05/17	Address subpoena issue; Email to insurance broker on affidavit; Email opposing counsel on subpoena	1.00	\$410.00	\$410.00
2407375	12/08/17	Email with insurance broker (bond issue)	0.20	\$410.00	\$82.00
2407435	12/08/17	Review court notice with Reply Brief	0.30	\$410.00	\$123.00
2412463	12/11/17	Review Reply Brief on Motion for summary action	0.80	\$410.00	\$328.00
2412472	12/12/17	Meeting to discuss reply on summary action brief and answer to motion to stay execution	0.80	\$410.00	\$328.00
2412503	12/14/17	Review draft response on motion to stay and review research on same	3.10	\$410.00	\$1,271.00
2412506	12/15/17	Revisions to response to motion and coordinate filing of same; Emails with opposing counsel on subpoena issue	7.60	\$410.00	\$3,116.00
2417948	12/18/17	Emails on status of subpoena	0.80	\$410.00	\$328.00
2417965	12/19/17	Issues with subpoena	0.30	\$410.00	\$123.00
2417980	12/20/17	Meet with Katherine to discuss status of motions	0.40	\$410.00	\$164.00
2426971	01/01/18	Review email from opposing counsel with objections to subpoena	0.30	\$410.00	\$123.00
2426973	01/02/18	Research on issues raised in objection to subpoena	0.70	\$410.00	\$287.00
2426985	01/03/18	Research on objections to subpoena	1.30	\$410.00	\$533.00
2432542	01/08/18	Emails with client on status and with opposing counsel on deposition	0.60	\$410.00	\$246.00
2433205	01/10/18	Email on deposition; Email with client; Review draft motion to compel and for Rule to Show Cause	0.70	\$410.00	\$287.00
2433224	01/11/18	Finalize and file Motion to Compel and for Rule to Show Cause	1.80	\$410.00	\$738.00
2442431	01/22/18	Review response on motion to compel	0.20	\$410.00	\$82.00
2449353	01/26/18	Prepare for and attend motion hearing	2.70	\$410.00	\$1,107.00
2449401	01/29/18	Review court notice	0.20	\$410.00	\$82.00
2449422	01/30/18	Email opposing counsel on deposition dates	0.20	\$410.00	\$82.00
2454575	02/05/18	Review client email	0.10	\$410.00	\$41.00
2458185	02/06/18	Review notice from 3rd Circuit and research same	0.50	\$410.00	\$205.00
2463576	02/12/18	Emails and research on Merits Panel	0.80	\$410.00	\$328.00
2463597	02/14/18	Email with client; Merit Panel issue	0.30	\$410.00	\$123.00
2465522	02/19/18	Emails with opposing counsel on deposition; Emails with client on status; Email to EEOC about amicus brief	1.20	\$410.00	\$492.00

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Robinson, Tamra

Faslo, G. Kevin

Case No.	Date	Description	Hours	Rate	Amount
2475308	02/28/18	Emails on amicus brief issue and status of briefing schedule	0.70	\$410.00	\$287.00
2478548	03/02/18	Emails with opposing counsel on extension request	0.40	\$410.00	\$164.00
2483884	03/07/18	Emails on amicus brief from EEOC and date for Answer	0.50	\$410.00	\$205.00
2485884	03/12/18	Emails on request for extension and review filing	0.50	\$410.00	\$205.00
2486580	03/13/18	Review court notice on extension and email client with update to briefing schedule	0.40	\$410.00	\$164.00
2520288	04/20/18	Opposing counsel email on joint exhibits	0.20	\$410.00	\$82.00
2526642	04/26/18	Email with opposing counsel on documents for joint appendix	0.30	\$410.00	\$123.00
2535853	05/04/18	Email on joint appendix	0.20	\$410.00	\$82.00
2541970	05/07/18	Review transcripts and forward same to opposing counsel for joint appendix	0.80	\$410.00	\$248.00
2548435	05/20/18	Emails on brief	0.40	\$410.00	\$164.00
2566481	05/21/18	Email on briefing	0.20	\$410.00	\$82.00
2566548	05/22/18	Review court notice and order; Email opposing counsel	0.70	\$410.00	\$287.00
2569470	06/29/18	Review court notices	0.10	\$410.00	\$41.00
2567608	06/08/18	Meet with Katherine on brief			
2578562	06/12/18	Meeting with Katherine; Work on brief			
2576585	06/13/18	Meet with Katherine and work on brief			
2576590	06/14/18	Research and work on brief	8.20	\$410.00	\$2,542.00
2576603	06/15/18	Work on brief	7.30	\$410.00	\$2,993.00
2578581	06/18/18	Meeting with Katherine and address issues with brief; Email client with update			
2583220	06/19/18	Emails with client on current status	0.40	\$410.00	\$164.00
2594024	07/02/18	Emails about Reply Brief	0.30	\$410.00	\$123.00
2638776	08/14/18	Review court email on dates for argument; Call with court on same; Email update to client	0.80	\$410.00	\$328.00
2638784	08/15/18	Review filing and client email	0.30	\$410.00	\$123.00
2652989	08/31/18	Review court notice about argument; Review forms for submission; Email with client; Review form from opposing counsel	1.00	\$410.00	\$410.00
2660268	09/04/18	File forms for argument	0.30	\$410.00	\$123.00
2851476	10/01/18	Meet with Katherine on letter brief and request for status report from District Court	0.50	\$410.00	\$205.00
3000753	10/02/18	Draft and file response to Oral Order from District Court; Emails with client; Begin review of case law cited by Third Circuit to prepare letter brief	3.80	\$410.00	\$1,478.00
3047876	10/03/18	Research on issues for letter brief; Begin drafting letter brief	6.40	\$410.00	\$2,624.00
3230218	10/04/18	Continue drafting letter brief; Review brief from Appellant; Research case law cited by Appellant and revise draft of letter brief	5.70	\$410.00	\$2,337.00
3290891	10/05/18	Brief issues	0.80	\$410.00	\$248.00

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Robinson, Tamra

<u>Fazio, G. Kevin</u>				
3319496	10/07/18	Finish draft of Letter Brief; Email same to Katherine for review; Organize Appeal Binder in anticipation of argument	7.50	\$410.00 \$3,075.00
3391986	10/08/18	Research on Rule 59 and Appellate Rule 4; Review model instructions and compare to ones used for trial; Revise and finalize Letter Brief	3.90	\$410.00 \$1,599.00
3581182	10/12/18	Review court notice and email client (no oral argument, case to be decided on briefs)	0.20	\$410.00 \$82.00
4508253	10/31/18	Emails with client on status	0.30	\$410.00 \$123.00
5050791	03/08/19	Emails with client to update on status	0.30	\$426.00 \$127.60
<u>Witherspoon Fry, Katherine</u>				
2322321	08/29/17	Review opinion and order denying motion for new trial and denying in part and granting in part motion for attorney's fees and costs; communicate with K. Fazio regarding same; edit communication with opposing counsel		
2340082	09/20/17	Communicate with K. Fazio regarding letter from opposing counsel and settlement strategy		
2340166	09/21/17	Confer with K. Fazio; draft letter to opposing counsel; review of answer to motion for new trial		
2345803	09/25/17	Email with Kevin regarding settlement offer	0.10	\$410.00 \$41.00
2346164	09/28/17	Confer with K. Fazio regarding appeal strategy, email to opposing counsel, settlement efforts		
2354422	10/06/17	Communicate with K. Fazio regarding appeal and email to opposing counsel		
2354460	10/09/17	Confer with K. Fazio regarding bond on appeal, mediation at Third Circuit; complete Entry of Appearance for filing; legal research regarding posting bond on appeal	0.30	\$410.00 \$123.00
2356826	10/10/17	Confer with K. Fazio; review court filings; legal research regarding posting bond	1.00	\$410.00 \$410.00
2361847	10/16/17	Confer with K. Fazio regarding motion to execute on judgment	0.10	\$410.00 \$41.00
2362048	10/17/17	Confer with K. Fazio and R. Green regarding motion to execute on judgment and defendant's assets; review draft sample motion to post bond and instruct R. Green regarding drafting motion; legal research	1.30	\$410.00 \$533.00
2363717	10/18/17	Communicate with K. Fazio regarding appeal bond and legal arguments on appeal	0.20	\$410.00 \$82.00
2368408	10/19/17	Draft motion to execute on judgment; confer with A. Delcollo, K. Fazio and R. Green re: mediation statement, law applicable to appeal, supersedeas bond; legal research for motion	3.20	\$410.00 \$1,312.00
2368800	10/25/17	Legal research regarding execution of judgment; confer with K. Fazio and A. Delcollo regarding same	1.30	\$410.00 \$533.00
2370379	10/26/17	Confer regarding execution on judgment	0.10	\$410.00 \$41.00
2371807	10/29/17	Confer with K. Fazio regarding mediation statement; edit draft mediation statement		
2372063	10/30/17	Edit mediation statement and communicate with K. Fazio regarding same		
2373681	10/31/17	Communicate with R. Green regarding execution on judgment	0.10	\$410.00 \$41.00

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Robinson, Tamra

Witherspoon Fry, Katherine
2377585 11/01/17

2384691	11/21/17	Email regarding execution on judgment	0.10	\$410.00	\$41.00
2384753	11/22/17	Confer with K. Fasic and A. Delcollo regarding motion for summary action	0.30	\$410.00	\$123.00
2388277	11/27/17	Communicate with K. Fasic and A. Delcollo regarding response to Appellant's motion	0.20	\$410.00	\$82.00
2398011	11/30/17	Confer with K. Fasic and A. Delcollo regarding motion for summary action			
2398468	11/30/17	Analysis of arguments presented in motion for summary action; confer with A. Delcollo regarding same	0.20	\$410.00	\$82.00
2402163	12/01/17	Edit response to motion for summary action and review motion for stay of execution			
2403099	12/01/17	Review motion for stay of execution	0.30	\$410.00	\$123.00
2403134	12/04/17	Review email from opposing counsel			
2408943	12/12/17	Review reply brief in support of summary action and communicate with A. Delcollo and K. Fasic regarding same and motion for excuse from posting bond			
2411557	12/14/17	Confer with A. Delcollo and K. Fasic regarding answer to motion for stay of execution; legal research regarding same			
2413278	12/15/17	Review and edit draft response to motion for stay of execution and communicate with K. Fasic regarding same			
2413284	12/18/17	Confer regarding service of subpoena and discovery in aid of execution	0.40	\$410.00	\$164.00
2415288	12/20/17	Confer with K. Fasic regarding motion for stay			
2423343	12/31/17	Review objections to subpoena and communicate with K. Fasic regarding same	0.10	\$410.00	\$41.00
2423338	01/02/18	Confer with K. Fasic re; subpoena			
2432064	01/11/18	Confer with K. Fasic re: motion to show cause			
2440524	01/23/18	Review Superior court filing	0.10	\$410.00	\$41.00
2441881	01/24/18	Review of documents from opposing counsel	0.10	\$410.00	\$41.00
2442681	01/25/18	Confer with K. Fasic regarding argument for motion to compel compliance with subpoena	0.10	\$410.00	\$41.00
2446885	01/30/18	Review Notice of Service of Documents	0.10	\$410.00	\$41.00
2454107	02/02/18	Review emails regarding discovery in aid of execution	0.10	\$410.00	\$41.00
2456275	02/05/18	Review email from client			
2458125	02/06/18	Review email from client	0.10	\$410.00	\$41.00
2458183	02/09/18	Communicate with K. Fasic regarding case assignment to panel and research regarding same			
2458144	02/10/18	Communicate regarding case referral to merits panel	0.10	\$410.00	\$41.00
2460254	02/13/18	Communicate with K. Fasic regarding deposition in aid of execution on judgment and assignment of appeal to merits panel	0.10	\$410.00	\$41.00
2464033	02/16/18	Communicate with K. Fasic regarding deposition in aid of execution	0.10	\$410.00	\$41.00

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Robinson, Tamra

Witherspoon Fry, Katharine
2463958 02/19/18

2463958	02/19/18	Confer with K. Fasic regarding deposition in aid of execution, appeal status; review emails from client	0.30	\$410.00	\$123.00
2472395	02/27/18	Review court order for briefing and calendar	0.10	\$410.00	\$41.00
2473784	02/28/18	Communicate with K. Fasic and email EEOC regarding interest in filing amicus brief in support of client's position			
2479077	03/02/18	Confer with K. Fasic regarding briefing at Third Circuit	0.10	\$410.00	\$41.00
2482002	03/07/18	Review email from EEOC and communicate with K. Fasic regarding amicus brief on appeal			
2488644	03/12/18	Review email from opposing counsel and motion to extend time to file			
2488638	03/13/18	Review emails from opposing counsel			
2486741	03/14/18	Email to J. Goldstein, EEOC, regarding possible amicus brief submission and communicate with K. Fasic regarding same	0.20	\$410.00	\$82.00
2535414	05/04/18	Communicate with K. Fasic regarding appeal joint appendix			
2563376	05/21/18	Review amended appendix filings; communicate with K. Fasic regarding same			
2568526	06/06/18	Review of opening brief; analysis of same; communicate with K. Fasic regarding same	1.20	\$410.00	\$492.00
2568678	06/06/18	Analysis of opening brief and confer with K. Fasic regarding same; legal research for answering brief	1.00	\$410.00	\$410.00
2567078	06/06/18	Confer with K. Fasic and A. Delcollo regarding answering brief; legal research for brief	2.40	\$410.00	\$984.00
2570199	06/07/18	Draft answering brief	2.50	\$410.00	\$1,025.00
2570201	06/08/18	Draft Answering brief	1.40	\$410.00	\$574.00
2570648	06/11/18	Draft Answering Brief; legal research for same; confer with K. Fasic and A. Delcollo regarding same	6.00	\$410.00	\$2,460.00
2573058	06/12/18	Draft answering brief; legal research for same; confer with K. Fasic and A. Delcollo regarding same	6.10	\$410.00	\$2,501.00
2573578	06/13/18	Draft Answering Brief; legal research for same; confer with K. Fasic and R. Green regarding same	8.00	\$410.00	\$3,280.00
2574403	06/14/18	Draft Answering Brief; legal research for same; confer with K. Fasic and R. Green regarding same	7.10	\$410.00	\$2,911.00
2576427	06/15/18	Edit Answering Brief; communicate with K. Fasic regarding same; email with opposing counsel regarding missing appendix page	1.20	\$410.00	\$492.00
2577655	06/18/18	Confer with K. Fasic; edit, complete and file Appellee's Answering Brief; review email from client; confer with R. Green regarding brief content and filing	8.80	\$410.00	\$3,608.00
2578551	06/19/18	Confer with R. Green regarding sending copies to court per local rule; email client			
2594058	07/03/18	Review reply brief; communicate with K. Fasic regarding same	0.60	\$410.00	\$206.00
2635234	08/14/18	Confer with K. Fasic regarding assignment to Third Circuit panel and merits for argument			
2652759	08/31/18	Email to client			
2657372	09/05/18	Confer with K. Fasic regarding court order and oral argument	0.10	\$410.00	\$41.00

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Robinson, Tamra

<u>Witherspoon Fry, Katherine</u>				
2657471	09/05/18	Legal research, new case for oral argument	0.30	\$410.00 \$123.00
2922491	09/27/18	Review court letter request regarding briefing and communicate with K. Fasio regarding same and legal research	0.20	\$410.00 \$82.00
2922871	10/01/18	Confer with K. Fasio regarding court's request for status report and additional briefing requested by Third Circuit		
2963871	10/02/18	Communicate with K. Fasio regarding status letter to court; legal research for letter requested by Third Circuit	1.50	\$410.00 \$615.00
3005291	10/03/18	Confer with K. Fasio regarding letter to Third Circuit and legal research for same		
3171423	10/04/18	Legal research for letter reply to Third Circuit and confer with K. Fasio regarding same; review Order Granting Stay of Execution; confer with K. Fasio; review letter filed with Third Circuit by First State	1.90	\$410.00 \$779.00
3341830	10/08/18	Confer with K. Fasio regarding law for letter brief; review letter brief and suggest changes	3.80	\$410.00 \$1,558.00
<u>Delcollo, Anthony N.</u>				
2352225	10/04/17	E-mail from/to attorney Fasio regarding third circuit embargment and research project for appeal		
2353485	10/05/17	Review local rules and research question of "appeal bond" and issue e-mail summarizing findings to GKF	1.00	\$315.00 \$315.00
2354021	10/06/17	E-mail from attorney Fasio regarding supersedeas bond, confer and provide analysis of same		
2354084	10/08/17	E-mail from/to proposed approach to compel supersedeas bond	0.20	\$315.00 \$83.00
2355081	10/09/17	Review multiple e-mails regarding case status and follow up to opposing counsel		
2358694	10/12/17	Review multiple e-mails regarding frivolous legal argument on appeal, confer with attorney fasio regarding same and evaluation of appellate rules	0.50	\$315.00 \$157.50
2358748	10/12/17	Conduct research regarding potential filing of counter "concise statement" and confer with attorney Fasio regarding same	0.50	\$315.00 \$157.50
2363320	10/16/17	Review multiple e-mails from attorney Fasio and confer regarding preparation of argument/legal analysis for mediation statement		
2363739	10/16/17	Confer with attorney Witherspoon regarding preparation of waiver argument		
2392248	11/21/17	Confer with attorney Fasio regarding research for procedure of response to odd summary appellate motion		
2392408	11/21/17	Review e-mail from attorney Fasio and filing regarding "motion for summary action" from opposing counsel	1.00	\$315.00 \$315.00
2392502	11/21/17	Review Appellate Rules and Local Appellate rules, prepare e-mail with summary of rules and analysis/suggestions of response to opposing counsel's motion for summary action	2.00	\$315.00 \$630.00
2392873	11/22/17	Review notes and correspondence in anticipation of meeting with attorney Fasio, confer regarding research for response to summary action motion		

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Robinson, Tamra

Delcalle, Anthony N.

Case No.	Date	Description	Hours	Rate	Amount
2393267	11/22/17	E-mail from attorney Fasic regarding analysis and update for mediation results, process moving forward			
2393278	11/22/17	Begin obtainment of factual information/research for execution of bond purposes	0.50	\$315.00	\$157.50
2393298	11/22/17	Research and pull multiple cases involved "doctrine of plain error"	2.50	\$315.00	\$787.50
2394910	11/27/17	Confer with attorney Fasic and attorney Witherspoon regarding case follow up and next steps for reply to "summary action" motion	0.20	\$315.00	\$63.00
2397672	11/29/17	Review Motion to Summary Action and begin research of treatises surrounding "reasonable accommodation and interactive process"	1.00	\$315.00	\$315.00
2398247	11/30/17	Review Bloomberg footnotes and begin outline of argument respecting interactive process/duty to accommodate	1.00	\$315.00	\$315.00
2398566	11/30/17	Confer with attorney Fasic and attorney Witherspoon, continue research regarding interactive process and reasonable accommodation	1.00	\$315.00	\$315.00
2398597	11/30/17	Review Motion exhibits and confer with attorney Fasic regarding same	1.00	\$315.00	\$315.00
2398157	11/30/17	Prepare first draft of Answer in Opposition to Motion for Summary Action	3.50	\$315.00	\$1,102.50
2398158	11/30/17	Conduct research on "plain error" doctrine	1.00	\$315.00	\$315.00
2400517	12/01/17	Review changes to draft motion and confer with attorney Fasic regarding follow up on waiver authority	1.00	\$315.00	\$315.00
2400550	12/01/17	Conduct research regarding waiver issue	0.50	\$315.00	\$157.50
2400627	12/01/17	Review final draft of answer in opposition and e-mail to attorney Fasic regarding approval of same	0.50	\$315.00	\$157.50
2401649	12/01/17	Confer with attorney Fasic regarding response to motion to stay execution	0.30	\$315.00	\$94.50
2401679	12/01/17	Further discussion of motion to stay execution of bond with attorney Fasic and preliminary review of motion	0.30	\$315.00	\$94.50
2403237	12/04/17	Review rules and e-mails, e-mail to attorney Fasic regarding timeframe for response to motion/timeframe	1.00	\$315.00	\$315.00
2403325	12/04/17	Review motion by opposing party and research rules/factors for argument, outline of proposed response, confirm no authority cited for bond exemption, confer with attorney Fasic regarding same	1.50	\$315.00	\$472.50
2409001	12/12/17	Confer with attorney Fasic and attorney Witherspoon regarding drafting of response			
2410531	12/13/17	Research authority and case law cited in opposing counsel's motion to stay	1.00	\$315.00	\$315.00
2410532	12/13/17	Draft answer in opposition to motion to stay, confer with attorney Fasic regarding same, e-mail to attorney Fasic regarding same	5.00	\$315.00	\$1,575.00
2411445	12/14/17	Pull case law and e-mail to attorney Fasic for review of answer in opposition draft	0.20	\$315.00	\$63.00
2411500	12/14/17	Conduct additional research and analysis of standard/factors for analysis of bond being granted, confer with attorney Fasic regarding same	1.00	\$315.00	\$315.00

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Robinson, Tamra

Delecco, Anthony N.

2434220	01/08/18	Confer with attorney Fasic regarding case status follow up and subpoena/motion from opposing counsel on same	0.20	\$315.00	\$63.00
2432642	01/12/18	Review objections and prepare notes regarding position of opposing counsel	0.50	\$315.00	\$157.50
2432727	01/12/18	Review case law and confer with attorney Fasic regarding motion that was filed	1.00	\$315.00	\$315.00
2457624	02/09/18	Confer with attorney Fasic regarding new development in Robinson matter, request for follow up regarding same			
2459169	02/10/18	Review order from Court, review local rules, appellate rules, and IOP, e-mail explanation to attorney Fasic and Witherspoon regarding next steps on appeal	1.00	\$315.00	\$315.00
2474583	02/28/18	Review notices and update e-mails regarding briefing schedule			
2566958	06/08/18	Confer with attorney Witherspoon regarding briefing research on "plain error" doctrine	0.30	\$315.00	\$94.50
2567004	06/08/18	Conclude search for cases/materials and confer with attorney Witherspoon regarding same	0.40	\$315.00	\$126.00
2571847	08/11/18	Review cases and confer with attorney Witherspoon regarding follow-up and next steps on same, response on issue involving "plain doctrine" error, suggestion regarding follow up on response to "Summary Action" request	1.00	\$315.00	\$315.00
2574177	08/13/18	Review analysis from co-counsel and follow up regarding potential issue on appeal			

Green, Rose L.

2362107	10/17/17	Retrieve pleading from docket, print, profile and calendar dates for mediation telephone conference and position statement			
2362927	10/18/17	Draft Motion to Post Bond.	1.10	\$165.00	\$181.50
2363974	10/19/17	Conduct research and cite check on case	0.80	\$165.00	\$99.00
2373721	10/22/17	Retrieve pleading from docket, profile clock copy of judgment complaint transferred from District Court; Call to court to confirm time frame to execute on judgment	0.40	\$165.00	\$66.00
2369080	10/26/17	Confer with KRW & GKF re best course of action; Call to U.S. District court re cost to request certified copy; Review docket, retrieve judgment and order; Prepare letter to court requesting triple seal certified copy of judgment and order; Prepare check request	1.10	\$165.00	\$181.50
2371126	10/27/17	Attention to request for exemplified triple seal copies of judgement and order for attorney fees	0.20	\$165.00	\$33.00
2372650	10/30/17	Attention to transfer of exemplified copy of judgment to Superior Court; Scan, profile and e-file with Superior Court Judgment department.	0.50	\$165.00	\$82.50
2380940	11/07/17	Email to GKF, KRW and AND re executing on the judgment	0.10	\$165.00	\$16.50
2381287	11/07/17	Attention to Draft of Notice of deposition and duces tecum	1.10	\$165.00	\$181.50

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Robinson, Tamra

Case No.	Date	Description	Hours	Rate	Amount
<u>Green, Rose L.</u> 2383440	11/10/17	Attention to revision of Notice of Subpoena duces tecum; Online review for opposing counsel's new firm name; Calendar deposition dates; Scan and email to process server and email copy to counsel	1.20	\$165.00	\$198.00
2388332	11/30/17	Call to O'Rourke investigation re status of service; Email details to GKF same			
2401586	12/01/17	Draft and prepare certificate of service for Third Circuit; E-file Answer in Opposition to Appellant's Motion for Summary Action	0.70	\$165.00	\$115.50
2402384	12/04/17	Retrieve pleading from docket, print, profile re Defendant's Motion to Stay Execution; Email to GKF; KRW and AND			
2403187	12/04/17	Scan, profile and e-file issued subpoena duces tecum			
2403782	12/05/17	Call to O'Rourke investigation services regarding subpoena duces tecum that was served on Bernice Edwards; Confer with GKF the same	0.40	\$165.00	\$66.00
2403780	12/05/17	Attention to docket, print, profile re Defendant's Statement re Motion to Stay of Execution on Appeal Statement	0.10	\$165.00	\$16.50
2403784	12/05/17	Attention to docket, print, profile re clock copy of subpoena duces tecum on Bernice Edwards	0.10	\$165.00	\$16.50
2407236	12/11/17	Retrieve pleading from docket, print, profile re Appellant's Reply to Appellee's answer to the Motion for Summary Action	0.10	\$165.00	\$16.50
2412175	12/15/17	Attention to e-file of Plaintiff's Answer in Opposition to Motion to Stay; Profile clock copy of same	0.50	\$165.00	\$82.50
2412722	12/18/17	Email to O'Rourke Investigation Associates for written statement confirming what was served on Ms. Edwards; Draft and prepare 2nd subpoena duces tecum; Email to process server; Calendar new dates; Email counsel copy of subpoena	0.70	\$165.00	\$115.50
2413063	12/18/17	Attention to preparation of courtesy copy to Judge Andrews			
2413780	12/18/17	Call from O'Rourke Investigative Associates confirming service on Ms. Edwards; Email to GKF same	0.10	\$165.00	\$16.50
2416737	12/20/17	Email to process server re proof of service; Call to court reporter to schedule deposition; Email subpoena to court reporter for proof of service; E-file signed affidavit/proof of service on Ms. Edwards	0.50	\$165.00	\$82.50
2430876	01/10/18	Draft and prepare Rule to Show Cause	1.00	\$165.00	\$165.00
2431522	01/11/18	Draft Notice and Certificate of Service to Plaintiffs Rule to Show Cause	0.40	\$165.00	\$66.00
2431842	01/11/18	Attention to Motion for Rule to Show Cause; Call to court; calendar hearing date; e-file RTSC	1.50	\$165.00	\$247.50
2432291	01/12/18	Attention to service of Motion to Compel for a Rule to Show Cause			
2432385	01/12/18	Retrieve pleading from docket, print, profile and forward clock copy to court; Call to court; Draft, prepare corrected Certificate of service, e-file same	0.30	\$165.00	\$49.50
2432833	01/12/18	Retrieve pleading from docket, print, profile re clock copy of Motion to Compel for a Rule to Show Cause	0.10	\$165.00	\$16.50
2438441	01/16/18	Prepare letter to Prothonotary re courtesy copy of Motion to Compel for a Rule to Show Cause	0.40	\$165.00	\$66.00

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Robinson, Tamra

Green, Rose L.

Case Number	Date	Description	Hours	Rate	Amount
2439816	01/22/18	Retrieve pleading from docket, print, profile re Defendant's Entry of Appearance	0.10	\$165.00	\$16.50
2439819	01/22/18	Retrieve pleading from docket, print, profile re Defendant's Response to Motion to Compel for a Rule to Show Cause	0.10	\$165.00	\$16.50
2447937	01/30/18	Retrieve pleading from docket, print, profile re COS of Defendant's Response to the Plaintiff's Request for Production	0.20	\$165.00	\$33.00
2452906	02/02/18	Call to court reporter, schedule and calendar deposition			
2452969	02/02/18	Attention to update of change to deposition			
2462060	02/15/18	Call to court reporter re postponement of deposition; update calendar	0.20	\$165.00	\$33.00
2465779	03/13/18	Upload and profile Appellant's Motion to Extend Time	0.10	\$165.00	\$16.50
2486995	03/14/18	Call to U.S. Third Circuit Appeals re deadline to answer			
2548849	05/21/18	Upload and profile Brief with Volume I of Appendix on behalf of Appellant	0.10	\$165.00	\$16.50
2572912	06/12/18	Attention to online search of Third Circuit website for Model Jury Instructions for KRW.	0.40	\$165.00	\$66.00
2573987	06/13/18	Attention to review and cite check of Transcript and record and update Appellate's Answering Brief	1.10	\$165.00	\$181.50
2574789	06/14/18	Online review, print and distribute to KRW of the Third Circuit and Federal Local Rules	0.60	\$165.00	\$99.00
2574935	06/14/18	Attention to review, analyze transcript for brief	3.20	\$165.00	\$528.00
2575394	06/15/18	Attention to research for font size for brief			
2576493	06/16/18	Review and retrieve page 116 from docket to Volume II of Defendant's Appendix	0.10	\$165.00	\$16.50
2576752	06/16/18	Draft and prepare certification page to brief; Draft and prepare table of contents; Assist KRW with locating specific citations and quotes; Prepare the table of authorities; Draft and prepare Certificate of service; E-file brief	3.50	\$165.00	\$577.50
2578484	06/19/18	Attention to preparation of service of Answering brief to Third Circuit; Upload and profile clock copy of Answering brief to Netdocs	1.10	\$165.00	\$181.50
2579201	06/19/18	Attention to service to Third Circuit Court of Appeals			
2594025	07/03/18	Upload and profile Appellant's Reply Brief	0.10	\$165.00	\$16.50
2606766	07/19/18	Attention to organization of client document	0.10	\$165.00	\$16.50
2636393	08/16/18	Attention to scheduling and e-filing available dates for Oral Argument in the 3rd Circuit	0.50	\$165.00	\$82.50
2656021	08/04/18	Scan, profile and e-file Entry of Appearance for GKF	0.40	\$165.00	\$66.00
2656026	08/04/18	Scan, profile and e-file Acknowledgment and Designation of arguing Counsel in 3rd Circuit	0.40	\$165.00	\$66.00
2928085	10/01/18	Upload and profile letter from Third Court Circuit re brief letter due			
2928637	10/01/18	Upload and profile Model Civil Jury Instructions	0.10	\$165.00	\$16.50
2976172	10/02/18	E-file Status letter to District court judge	0.40	\$165.00	\$66.00
3331458	10/08/18	Meeting with GKF re research on Rule 59(e)	0.40	\$165.00	\$66.00

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Robinson, Tamra

Green, Rose L.

3331769	10/08/18	Conduct research on Rule 59(e); Discuss findings with GKF	1.80	\$185.00	\$264.00
3444517	10/09/18	Attention to draft, prepare Certificate of Service to Appellee's Letter Brief and e-file same	0.40	\$165.00	\$66.00
3921768	10/17/18	Upload and profile Status Report to Netdocs			
3922507	10/17/18	Upload and profile Order re Motion to Stay of execution on appeal			

 Total Services Rendered

 TOTAL UNBILLED - FEES & COSTS

 \$88,326.50

BALANCE DUE FROM PREVIOUS STATEMENT
 LESS PAYMENT(S) APPLIED
 ADJUSTMENTS & WRITE-OFFS SINCE LAST BILL
 BALANCE FORWARD

CURRENT WIP PERIOD:
 WIP SERVICES SUB-TOTAL
 WIP COSTS ADVANCED SUB-TOTAL

WIP SUB-TOTAL CURRENT PERIOD

TOTAL WIP AND A/R DUE

Client/Matter		04250022.00001		Robinson, Tamra		Robinson v. First State Community Action	
Date	Timekeeper	Status	Is Bill Hours	To Bill Rate	To Bill Amount	Narrative	
4/1/2019	Fasic, G. Kevin	W	2.9	\$ 425.00	\$ 1,232.50	Review court decision and judgment; Discuss strategy for attorney's fees and bond and begin research on same; Email and call with client	
4/1/2019	Green, Rose L.	W	0.2	\$ 165.00	\$ 33.00	Print, upload and profile signed order and Precedential Order	
4/1/2019	Green, Rose L.	W	1.6	\$ 165.00	\$ 264.00	Attention to review of District Court docket, for Motion and signed Order on Bond; Attention to review of Rules regarding bonds	
4/1/2019	Kuhns, Joyce A.	W	0.2	\$ 495.00	\$ 99.00	Emails with K. Witherspoon Fry bankruptcy protection language to add to settlement	
4/1/2019	Witherspoon Fry, Katherine	W				Telephone client; review decision on appeal; strategize regarding obtaining bond on appeal and settlement negotiations	
4/3/2019	Fasic, G. Kevin	W	1.1	\$ 425.00	\$ 467.50	Work on bond request and fee application	
4/4/2019	Fasic, G. Kevin	W	6.3	\$ 425.00	\$ 2,677.50	Draft Motion regarding Bond; Research of fee application	
4/4/2019	Witherspoon Fry, Katherine	W	1.5	\$ 425.00	\$ 637.50	Edit motion for reconsideration for posting supersedeas bond; confer with K. Fasic regarding same	
4/5/2019	Fasic, G. Kevin	W	1.1	\$ 425.00	\$ 467.50	Work on motion regarding Bond	
4/5/2019	Witherspoon Fry, Katherine	W				Communicate with K. Fasic regarding bond motion and attorneys' fees application	
4/8/2019	Fasic, G. Kevin	W				Research on filing motion for fees for appellate work	
4/8/2019	Witherspoon Fry, Katherine	W	2.1	\$ 425.00	\$ 892.50	Appellate attorneys' fees research; confer with K. Fasic regarding same	
4/9/2019	Fasic, G. Kevin	W	4.4	\$ 425.00	\$ 1,870.00	Research and work on motion	
4/9/2019	Witherspoon Fry, Katherine	W				Confer with K. Fasic regarding form and content of attorneys' fees application; legal research regarding same	
4/10/2019	Fasic, G. Kevin	W	2.5	\$ 425.00	\$ 1,062.50	Work on motion	
4/10/2019	Witherspoon Fry, Katherine	W	0.4	\$ 425.00	\$ 170.00	Research regarding fees application, reviewing same	
4/11/2019	Fasic, G. Kevin	W	3.6	\$ 425.00	\$ 1,530.00	Work on motion	
4/11/2019	Witherspoon Fry, Katherine	N				Communicate with K. Fasic regarding fees application	
4/12/2019	Fasic, G. Kevin	N	7.3	\$ 425.00	\$ 3,102.50	Draft Motion and organize exhibits; Emails on attorney's fees back-up	
4/12/2019	Witherspoon Fry, Katherine	N				Communicate with K. Fasic regarding fees application	
4/14/2019	Witherspoon Fry, Katherine	N	1	\$ 425.00	\$ 425.00	Communicate with K. Fasic regarding motion for attorneys' fees on appeal and to require defendant to post bond and edit same	
					\$ 17,651.00		